

Joseph J. Tabacco, Jr. (75484)
 Email: jtabacco@bermanesq.com
 Christopher T. Heffelfinger (118058)
 Email: cheffelfinger@bermanesq.com
 Nicole Lavallee (165755)
 Email: nlavallee@bermanesq.com
 Julie J. Bai (227047)
 Email: jbai@bermanesq.com
**BERMAN, DeVALERIO, PEASE, TABACCO
 BURT & PUCILLO**
 425 California Street, 21st Floor
 San Francisco, California 94104
 Telephone: (415) 433-3200
 Facsimile: (415) 433-6382

Liaison Counsel for Lead Plaintiffs

E-FILED - 2/28/07

[Additional Counsel Appear on Signature Page]

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

IN RE MARVELL TECHNOLOGY GROUP,
 LTD. SECURITIES LITIGATION

Master File No. 06-06286 RMW

CLASS ACTION

**STIPULATION AND [] ORDER
 (1) SETTING TIME FOR FILING OF
 CONSOLIDATED CLASS ACTION
 COMPLAINT (2) ESTABLISHING
 BRIEFING SCHEDULE FOR
 RESPONSIVE MOTION(S) AND (3)
 CONTINUING CASE MANAGEMENT
 CONFERENCE**

THIS DOCUMENT RELATES TO:

All Actions.

Lead Plaintiffs Police and Fire Retirement System of the City of Detroit, Monte Paschi
 Asset Management S.G.R. S.p.A., and Puerto Rico Government Employees Retirement System
 (“Lead Plaintiffs”) and defendant Marvell Technology Group, Ltd. (“Marvell”), by and through
 their respective counsel hereby recite and stipulate, subject to court approval, as follows

[C-06-06286 RMW] STIPULATION AND [] ORDER (1) SETTING TIME FOR
 FILING OF CONSOLIDATED CLASS ACTION COMPLAINT; (2) ESTABLISHING
 BRIEFING SCHEDULE FOR RESPONSIVE MOTION(S); AND (3) CONTINUING CASE
 MANAGEMENT CONFERENCE

concerning the filing of a consolidated class action complaint (“Consolidated Complaint”), the briefing schedule for any responsive motions and continuing the Case Management Conference currently scheduled for March 2, 2007.

RECITALS

WHEREAS certain plaintiffs filed this securities class action complaint on October 5, 2006 (Dkt. 1), alleging that defendants Sehat Sutardja, Weili Dai, Pantas Sutardja, George A. Hervey and Marvell Technology Group Ltd. engaged in certain conduct in connection with the granting of stock options which allegedly violated federal securities laws;

WHEREAS, certain of the claims in this class action arise under the Private Securities Litigation Reform Act of 1995 (the “PSLRA”);

WHEREAS, on October 23, 2006, the Court issued an Order Setting Initial Case Management Conference in this case [Dkt. 4], scheduling an Initial Case Management Conference for March 2, 2007, and setting related deadlines;

WHEREAS, by order dated February 2, 2007 [Dkt. 112] and amended on February 7, 2007 [Dkt. 114], the Court consolidated the related class action complaints and appointed Lead Plaintiffs and Kohn, Swift & Graf, P.C. and Schiffrin Barroway Topaz & Kessler, LLP as Co-Lead Counsel, and Berman DeValerio Pease Tabacco Burt & Pucillo as Liaison Counsel;

WHEREAS Marvell Technology Group, Ltd.’s (“Marvell” or the “Company”) has announced that it intends to file restated financials (the “Restatement”);

WHEREAS Lead Plaintiffs intend to file a Consolidated Complaint, and Defendants may file motion(s) pursuant to Federal Rule of Civil Procedure 12 in response to the Consolidated Complaint;

WHEREAS, although plaintiffs may properly file the Consolidated Complaint at any time, the undersigned counsel agree that the interests of justice and judicial economy would be served by an order giving plaintiffs the option to file the Consolidated Complaint after the Restatement in order to include the Company's full Restatement in the Consolidated Complaint; and

WHEREAS, the undersigned counsel further agree that the interests of justice and judicial economy would be served by an order continuing the Case Management Conference in this PSLRA case until after the Court has decided all motions to dismiss filed by defendants in response to the Consolidated Complaint.

STIPULATION

Therefore, IT IS HEREBY STIPULATED AND AGREED by Lead Plaintiffs and Defendants, through their respective counsel of record, as follows:

1. Lead Plaintiffs shall file and serve the Consolidated Complaint no later than 45 days after the filing with the SEC of Marvell's Restatement.
2. Defendants shall file and serve their responsive pleading(s) or motions no later than 45 days after the filing of the Consolidated Complaint.
3. Lead Plaintiffs shall file and serve their opposition brief(s) no later than 45 days after the filing of Defendants' responsive pleading(s) or motions.
4. Defendants shall file and serve their reply briefs no later than 21 days after the filing of Lead Plaintiffs' opposition brief(s).
5. Once the Court rules upon the motion to dismiss, the parties shall ask the Court to set a new date for the Case Management Conference.
6. The parties hereby request that the Case Management Conference set for March 2, 2007 at 1:30 p.m. be taken off calendar pending further order of the Court.

Dated: February 22, 2007

**BERMAN DeVALERIO PEASE TABACCO
BURT & PUCILLO**

By: /s/ Nicole Lavallee
NICOLE LAVALLEE

Joseph J. Tabacco, Jr.
Christopher T. Heffelfinger
Julie J. Bai
425 California Street, Suite 2100
San Francisco, CA 94104
Telephone: (415) 433-3200

Liaison Counsel for Lead Plaintiffs

KOHN, SWIFT & GRAF, P.C.

Joseph C. Kohn
William E. Hoese
Denis F. Sheils
Stephen H. Schwartz
One South Broad Street, Suite 2100
Philadelphia, PA 19107
Telephone: (215) 238-1700

**SCHIFFRIN BARROWAY TOPAZ
& KESSLER, LLP**

Michael K. Yarnoff
John Kehoe
Robert Biela
280 King of Prussia Road
Radnor, PA 19087
Telephone: (610) 667-7706

Co-Lead Counsel

NIX PATTERSON & ROACH, LLP

Jeffrey J. Angelovich
Bradley E. Beckworth
205 Linda Drive
Daingerfield, TX 75638
Telephone: (903) 645-7333

Additional Counsel for Lead Plaintiffs

I, Nicole Lavallee, am the ECF User whose ID and password are being used to file this Stipulation and [Proposed] Order . In compliance with General Order 45, X.B., I hereby attest that Andrew D. Lanphere has concurred in this filing.

1 Dated: February 22, 2007

PILLSBURY WINTHROP SHAW PITTMAN LLP

2 By: /s/ Andrew D. Lanphere
3 ANDREW D. LANPHERE

4 2475 Hanover Street
5 Palo Alto, CA 94304
6 Telephone: (650) 233-2400

PILLSBURY WINTHROP SHAW PITTMAN LLP

7 Bruce A. Ericson
8 Andrew D. Lanphere
9 50 Fremont Street
10 Post Office Box 7880
11 San Francisco, CA 94120-7880
12 Telephone: (415) 983-1000

PILLSBURY WINTHROP SHAW PITTMAN LLP

13 C.J. Martin
14 501 West Broadway, Suite 1100
15 San Diego, CA 92101-3575
16 Telephone: (619) 234-5000

**Counsel for Defendant Marvell Technology Group,
Ltd.**

17 * * * *

18 **[] ORDER**

19 Pursuant to the foregoing stipulation, and good cause appearing,

20 **IT IS HEREBY ORDERED that:**

- 21 1. Lead Plaintiffs shall file and serve the Consolidated Complaint no later than 45
22 days after the filing with the SEC of Marvell's Restatement.
- 23 2. Defendants shall file and serve their responsive pleading(s) or motions no later
24 than 45 days after the filing of the Consolidated Complaint.
- 25 3. Lead Plaintiffs shall file and serve their opposition brief(s) no later than 45 days
26 after the filing of Defendants' responsive pleading(s) or motions.
- 27 4. Defendants shall file and serve their reply briefs no later than 21 days after the
28 filing of Lead Plaintiffs' opposition brief(s).

6. Once the Court rules upon the motion to dismiss, the Court shall set a new date for the Case Management Conference.

Dated: 2/28, 2007

[C-06-06286 RMW] STIPULATION AND [] ORDER (1) SETTING TIME FOR
FILING OF CONSOLIDATED CLASS ACTION COMPLAINT; (2) ESTABLISHING
BRIEFING SCHEDULE FOR RESPONSIVE MOTION(S); AND (3) CONTINUING CASE
MANAGEMENT CONFERENCE